



**PARDALIS & NOHAVICKA, LLP**  
ATTORNEYS

December 22, 2020

VIA ECF

Honorable Steven M. Gold  
United States Magistrate Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**APPLICATION TO WITHDRAW  
MOTION TO BE RELIEVED**

RE: *Poulmentis v. Plaza Patisserie, et al.*  
Docket No. 1:19-cv-05284-ENV-SMG

Dear Honorable Steven M. Gold:

This office represents Defendants Plaza Patisserie and Chris Kouvaros with regard to the above-captioned matter. We have reached out to Chris Kouvaros and advised him that Your Honor directed, in an Order, dated December 22, 2020, via ECF, as follows:

Plaintiff may move to enforce the settlement by January 8, 2021. If counsel for defendants still seeks to be relieved, he may so advise the Court and, if possible, shall indicate whether defendants consent to the motion or seek to be heard.

Although Chris Kouvaros told our office that he does not oppose our motion to be relieved, because of the potential exposure to him personally in the face of imminent collection efforts by plaintiff's counsel, we cannot in good conscience abandon him at this point. Therefore, we will continue the representation of Chris Kouvaros until he affirmatively terminates our firm or until the case itself is terminated and closed. We represent that we will not be billing the defendants for this continued representation, and he is still invited to participate in all proceedings using our office's access to remote appearances.

Wherefore, the undersigned requests that Pardalis & Nohavicka LLP's motion to be relieved as counsel be withdrawn.

Respectfully submitted,

**PARDALIS & NOHAVICKA, LLP**

By: /s/Joseph D. Nohavicka  
Joseph D. Nohavicka

cc: Chris Kouvaros